



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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December 21, 2007

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EDMC

Ms. Shirley J. Olinger, Manager
Office of River Protection
United States Department of Energy
P.O. Box 450, MSIN: H6-60
Richland, Washington 99352

Mr. William S. Elkins, Project Director
Bechtel National, Inc.
2435 Stevens Center Place, MSIN: H4-02
Richland, Washington 99354

Re: Submittal of Hanford Facility RCRA Permit Modification Notification Form
24590-WTP-PCN-ENV-07-004; Class 1 Modification to the Hanford Facility Resource
Conservation and Recovery Act (RCRA) Permit, Dangerous Waste Portion, for the
Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit 10
(Waste Treatment and Immobilization Plant), WA7890008967

0073894

Dear Ms. Olinger and Mr. Elkins:

The Department of Ecology approves the referenced Class 1 Modification submitted September 10, 2007. The approved Hanford Facility RCRA Permit Modification Notification Form is enclosed.

Modification 24590-WTP-PCN-ENV-07-004 provides the updated Engineering Specification for Nuclear Grade High Efficiency Particulate Air Filters (24590-WTP-3PS-MKH0-T0002, Revision 2) which replaces the current permit specification in Appendix 7.7.

If there are any questions, contact me at 509-372-7882, or Robbie Biyani at 509-372-7884.

Sincerely,

Brenda Becker-Khaleel
WTP Permit Writer
Nuclear Waste Program

jc
Enclosure

cc: See next page

Ms. Olinger and Mr. Elkins
December 21, 2007
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cc electronic w/enc:

Dave Bartus, EPA
John Eschenberg, USDOE
Lori Huffman, USDOE
Tony McKarns, USDOE
Gae Neath, USDOE
Don Sommer, USDOE
William Taylor, USDOE
Julie Colby, BNI
Brad Erlandson, BNI
Peggy Fisher, BNI
Stan Hill, BNI
Dennis Klein, BNI
Sandi Murdock, BNI
Phil Peistrup, WGI

cc w/enc:

Administrative Record: Tank Waste Treatment Requirements ✓ H-0-8
Environmental Portal
Hanford Operating Record General File
USDOE-ORP Correspondence Control

Quarter Ending 9/30/2007

24590-WTP-PCN-ENV-07-004

Hanford Facility RCRA Permit Modification Notification Form**Part III, Operating Unit 10****Waste Treatment and Immobilization Plant**

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Page 2 of 3: Hanford Facility RCRA Permit, Part III, Operating Unit 10, Waste Treatment and Immobilization Plant
Update engineering specification 24590-WTP-3PS-MKH0-TP002 *Engineering Specification for Nuclear
Grade High Efficiency Particulate Air (HEPA) Filters (ASME AG-1 Section FK Filters)* in Appendix 7.7 of the
Dangerous Waste Permit

Submitted by Co-Operator:

Reviewed by ORP Program Office:




D. A. Klein


8/22/07

Date

S. J. Olinger


9/7/07

Date

Quarter Ending 9/30/2007

24590-WTP-PCN-ENV-07-004

Hanford Facility RCRA Permit Modification Notification Form

Unit:

Waste Treatment and Immobilization Plant

Permit Part & Chapter:

Part III, Operating Unit 10Description of Modification:

The purpose of this Class 1 modification is to update the engineering specification for High Efficiency Particulate Air (HEPA) Filters in Appendix 7.7 of the Dangerous Waste Permit. The following source specification [*Engineering Specification for Nuclear Grade High Efficiency Particulate Air (HEPA) Filters (ASME AG-1 Section F-K Filters)*] is submitted to replace the permit specification currently in Appendix 7.7:

Appendix 7.7

Replace:	24590-WTP-3PS-MKH0-TP002 Rev 1	With:	24590-WTP-3PS-MKH0-T0002 Rev 2
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This modification requests Ecology approval and incorporation into the permit the revised engineering specification. This revision is considered a complete revision and, therefore, the changes are not reflected by side bars. Revisions are the result of incorporation of the new ASME AG-1 Section FK standard for radial HEPA filters. The new ASME AG-1 Section FK standard has been developed for the WTP radial HEPA filters and it replaces Section FC. The following identifies the significant changes to the attached engineering specification:

- Changed the specification title to clarify intent of specification
- Replaced requirements of ASME AG-1 Section FC with Section FK (Section 2.1.7 and throughout the document)
- Revised edition of ASME N509 from 1989 to 2002 (Section 2.1.2)
- Added DOE STD-3020-2005, *Specification for HEPA Filters Used by DOE Contractors* (Section 2.2.1)
- Added DOE STD-3025-99, *Quality Assurance Inspection and Testing of HEPA Filters* (Sections 2.2.2 and 6.3)
- Added a reference to the 24590-WTP-SDDR-HV-06-00008 regarding the new ASME AG-1 Section FK (Section 2.5.1)
- Added Sections 3.4 Temperature, 3.5 Aging, 6.3 DOE Filter Test Facility Quality Assurance Testing, and 8.2 Quality Assurance Requirements Specific to Item
- Clarified fabrication exceptions (Section 5.1.1)
- Added Appendix A HEPA Filter Data Sheet
- Updated the sections describing Definitions and Safety and Quality Classifications
- Other changes to clarify the BNI requirements for Preparation for Shipment (Section 7) and Documentation and Submittals (Section 10).

The following is a list of outstanding change documents that have not been incorporated into this specification:

- 24590-WTP-3PN-MKH0-00022, *Specification Change Notice*.

WAC 173-303-830 Modification Class: ^{1 2}

Please mark the Modification Class:

Class 1

Class ¹1

Class 2

Class 3

X

Enter Relevant WAC 173-303-830, Appendix I Modification citation number:

A.1. and A.3.

Enter wording of WAC 173-303-830, Appendix I Modification citation:

¹ Class 1 modifications requiring prior Agency approval.

² If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to a Class '1, if applicable.

Quarter Ending 9/30/2007

24590-WTP-PCN-ENV-07-004

A. General Permit Provisions

1. Administrative and informational changes
3. Equipment replacement or upgrading with functionally equivalent components (e.g., pipes, valves, pumps, conveyors, controls)

Modification Approved: ☒ Yes ☐ No (state reason for denial)Reason for denial:

Reviewed by Ecology:



B. Becker-Khaleel

12/21/07

Date